



TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

April 25, 2011

TO: Internal File 

THRU: Daron Haddock, Coal Program Manager, Permit Supervisor

FROM: Ingrid Campbell, Environmental Scientist II 

RE: Gob Vent Holes, West Ridge Resources, West Ridge Mine, Permit C/007/0041 and Task #3809

SUMMARY:

On April 12, 2011, the Division received an application from West Ridge Resources to amend the West Ridge Mine Mining and Reclamation Plan to allow the drilling of two new gob gas vent holes (GVH) at the the existing Bear Canyon GVH installation. The new GVH's are needed to liberate excessive quantities of underground methane for the safety of the mine workforce, and to maintain production for existing coal-supply contracts. The proposed drilling will occur within previously- permitted area and will require a new disturbance area of less than .02 acres.

This application is recommended for approval based on receipt of an updated Threatened and Endangered species list.

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TECHNICAL ANALYSIS:

GENERAL CONTENTS

RIGHT OF ENTRY

Regulatory Reference: 30 CFR 778.15; R645-301-114

Analysis:

The right of entry is under existing SITLA lease ML-49297 for surface and mineral rights. Attachment 6 includes an approval letter from John Blake of SITLA to drill two additional GVH.

Findings:

The information provided is considered adequate to meet the minimum regulatory requirements for this section.

LEGAL DESCRIPTION AND STATUS OF UNSUITABILITY CLAIMS

Regulatory Reference: 30 CFR 778.16; 30 CFR 779.12(a); 30 CFR 779.24(a)(b)(c); R645-300-121.120; R645-301-112.800; R645-300-141; R645-301-115.

Analysis:

Chapter 1, legal description of the disturbed area was updated. .02 acres of GVH 5 "pullout" was added to make a total of 30.99 disturbed acres within the West Ridge Mine permit area. The Legal description of the disturbed acres within the permit area was updated to include the GVH 5 pullout in NESWSE T14S, R13E, Section 3.

The permit area will not change as a result of this amendment.

Findings:

The information provided is considered adequate to meet the minimum regulatory requirements for this section.

ENVIRONMENTAL RESOURCE INFORMATION

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

HISTORIC AND ARCHEOLOGICAL RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.12; R645-301-411.

Analysis:

Attachment 9 includes correspondence between John Senulis, the archeological consultant for the project, and Kenny Wintch, Lead Archeologist for SITLA. Also, more correspondence is located in 2011 incoming 04182011.3809.pdf. John Senulis recommended the project for clearance without a Class III walkover survey for the following reasons:

- The area has been disturbed by road construction,
- The right fork of Bear Canyon Creek is an intermittent stream that floods the bottom of the valley after the spring runoff,
- Mr. Senulis walked the area and no cultural resources were observed although it was not a formal survey.,
- There are several class III surveys in and near the proposed GVH and no cultural resources were located. The surveys include 08-737, 08-871, 08-909.
- Mr. Senulis' work and the work of Nielson construction have not discovered any significant cultural resources in the surrounding sections.

In the incoming 2011 04182011.3809.pdf email, SITLA archaeologist, Kenny Wintch, gave clearance for the project.

Findings:

The information provided is considered adequate to meet the minimum regulatory requirements for this section.

VEGETATION RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.19; R645-301-320.

Analysis:

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Prior to installation of the existing GVH pad, an on-site vegetation survey was conducted by Dr. Patrick Collins of Mt. Nebo Scientific. This survey is located in Attachment 4 of Appendix 5-14 of the approved M&RP. New areas outside of the existing permit area will be disturbed during the installation of the two additional GVH. However, .02 acres of previously undisturbed land will be disturbed as a result of the installation. The existing vegetation survey, located in attachment 4 of appendix 5-14 of the MRP, was conducted by Dr. Patrick Collins in October of 2008. The survey serves as baseline vegetation data for the Bear Canyon GVH site. The survey sampled Douglas fir/maple plant community and the selected reference area for that community. According to the map at the end of the report in Attachment 4, the vegetation along the bottom of bear canyon is Douglas fir/ Maple plant community. Page 3 of 5-14A states that the additional proposed disturbance area for the GVH 5 pullout mainly consists of the existing access road. The less than .02 acres of disturbance will also be reclaimed according to the existing approved GVH plan according to the Douglas fir/maple reference area and baseline data collected.

Findings:

The information provided is considered adequate to meet the minimum regulatory requirements for this section.

LAND-USE RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.22; R645-301-411.

Analysis:

There will be no changes to the land use information for the Bear Canyon area as a result of the addition of two GVH. The sites land use is categorized as grazing and is located in the Bear Canyon Grazing allotment.

Findings:

The information provided is considered adequate to meet the minimum regulatory requirements for this section.

OPERATION PLAN

FISH AND WILDLIFE INFORMATION

Regulatory Reference: 30 CFR Sec. 784.21, 817.97; R645-301-322, -301-333, -301-342, -301-358.

Analysis:

Endangered and Threatened Species

Endangered and Threatened species are listed in Attachment 16 of appendix 5-14 in the approved M&RP. Dr. Patrick Collins of Mt. Nebo Scientific analyzed the presence of T&E species in and around the bear Canyon GVH site. The list was compiled in October of 2008 and is outdated. Dr. Collins found there would be no impacts to T&E species as a result of the GVH site. Dr. Collins updated the T&E list in April 2011 and WRR will submit the update for incorporation into the MRP. The list included all current T&E species, and indicated that no species or their habitat exists in the project area.

Bald and Golden Eagles

A 2010 raptor survey for the West Ridge permit area was included in attachment 8 of the Appendix 5-14 A submittal. The raptor survey included the Bear Canyon GVH area (section 3 of T13S R13E). There are four raptor nests located in or around the bear canyon area. In 2010, these nests were as follows, two inactive Redtail hawk nests, an inactive raven nest, and an inactive golden eagle nest. There should be no impact to raptors from the addition of two new GVH at the existing well pad.

Findings:

The information provided is considered adequate to meet the minimum regulatory requirements for this section.

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RECLAMATION PLAN

REVEGETATION

Regulatory Reference: 30 CFR Sec. 785.18, 817.111, 817.113, 817.114, 817.116; R645-301-244, -301-353, -301-354, -301-355, -301-356, -302-280, -302-281, -302-282, -302-283, -302-284.

Analysis:

Revegetation: General Requirements

Revegetation plans are located in the existing approved Appendix 5-14. Attachment 13 of Appendix 5-14 includes the reclamation seed mix, timetable, and monitoring schedule. This approved plan will be used for the proposed additional GVH as well. No additional information is necessary due to the additional GVH proximity and similarity to the other existing GVH in the canyon.

Findings:

The information provided is considered adequate to meet the minimum regulatory requirements for this section.

RECOMMENDATIONS:

This application is recommended for approval based on receipt of an updated Threatened and Endangered species list.

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